

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION**

RICHARD GRAHAM, Plaintiff, v. TRUIST BANK, Defendant.))))))))))))
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	CIV. ACTION NO. <u>3:24-cv-5817-SAL</u>
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TRUIST BANK's LOCAL RULE 26.01 INTERROGATORY RESPONSES

COMES NOW Defendant Truist Bank (“Truist”), by and through its undersigned counsel, and submits its answers to the Court’s Local Civil Rule 26.01 Interrogatories, as follows:

- (A) State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.**

Truist is not aware of any person or legal entity who has a subrogation interest in any claim.

- (B) As to each claim, state whether it should be tried jury or nonjury and why.**

Truist notes that Plaintiff has requested a jury trial.

- (C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.**

Truist Bank is a wholly-owned subsidiary of Truist Financial Corporation, the stock of which is publicly traded under the symbol “TFC.” Truist Financial Corporation was formed on December 6, 2019, by the merger of BB&T Corporation (“BB&T”) and SunTrust Banks, Inc. Truist Bank was formed on December 7, 2019, by the merger of Branch Banking and Trust

Company and SunTrust Bank. There is no publically traded corporation that owns 10% or more of the stock of Truist Financial Corporation.

- (D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).**

Truist does not challenge the appropriateness of the division.

- (E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which *may be* related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for other reason would entail substantial duplication of labor if heard by different judges.**

To the best of Truist's knowledge, this action is not related in whole or in part to any other matter filed in this District.

- (F) If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.**

N/A

- (G) If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.**

Truist is not aware at this time of any other party which might be liable to it in this action. However, Truist is investigating this matter, and will supplement/amend its response should additional information become available.

Dated October 11, 2024.

Respectfully submitted,

/s/ Richard C. Keller
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Attorney for Defendant Truist Bank

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document has been served on the following via U.S. First Class Mail, postage prepaid, and via e-mail on this 11th day of October, 2024:

Dave Maxfield, Esq.
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Counsel for Plaintiff

/s/ Richard C. Keller
Richard C. Keller
Of Counsel